



United States Department of the Interior

NATIONAL PARK SERVICE

Zion National Park
Springdale, UT 84767



N3615 x L7621 (ZION RM&R)

February 28, 2008

Rod A. Moore
Nevada Division of Environmental Protection
Bureau of Air Pollution
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

Nevada
Environmental Protection

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ENVIRONMENTAL PROTECTION

Dear Mr. Moore:

Thank you for the opportunity to comment on the issuance of a permit for Toquop Energy Project. As a Prevention of Significant Deterioration (PSD) Class I area, Zion National Park continues to have concerns about adverse air quality impacts to the park and the region from the proposed 750 MW coal-fire power plant.

Zion National Park is located in southwestern Utah and represents one of the world's most spectacular examples of canyon formation. Park visitors and area residents view the multi-colored rock escarpments from close range within the canyons and from great distances because they extend above the surrounding terrain. Higher viewpoints in the park provide visitors with more distant vistas of the Pine Valley Mountains, Beaver Dam Mountains, Smithsonian Butte and the escarpment of the Markagunt Plateau.

With some of the clearest air in North America, the Great Basin and Colorado Plateau are particularly vulnerable to visibility degradation. Haze from coal-fired power generation is a concern to the park because it could result in distant features being lost from view entirely and nearby features losing detail and the vibrant colors that give southwest Utah the name "Color Country."

The core mission of the National Park Service (NPS) is to preserve and protect the natural and cultural resources and the scenery in a way and by such means as to leave them unimpaired for future generations. As intended for Class I national parks through the Clean Air Act and its implementing regulations, visibility and the viewshed at Zion National Park are primary park resources, to remain as pristine as possible.

The NPS is concerned about any and all incremental decreases in regional visibility. And any and all increases in criteria and hazardous pollutants, regardless of whether or not they exceed air quality

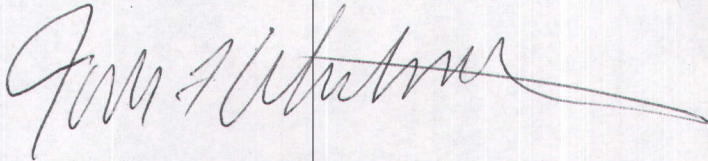
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standards. If the Toquop Energy Project is permitted and built, there will be an increase over existing levels for volatile organic compounds, carbon monoxide, nitrogen oxides, sulfur dioxide, PM₁₀, and hazardous air pollutants. Even if these levels are deemed insignificant or below thresholds that would adversely affect the park and regional visibility. There should be measures identified to mitigate the impacts to the park and to mitigate increasing regional haze.

The permitting process should consider the cumulative impacts from the construction and operation from all three of the coal-fired power plants proposed for eastern Nevada. Including the Sierra Pacific Resources-Ely Energy Center Project-1500 MW coal-fired plant, the White Pine Energy Station Project-two 500 to 800 MW coal-fired plants, and the Toquop Energy Project.

We appreciate that the Nevada Division of Environmental Protection has extended the public comment period. We continue to be very concerned about the cumulative impacts of this project along with the Sierra Pacific Resources Ely Energy Center and the White Pine Energy Station Projects on Zion National Park. We hope you will consider our comments. If you have any questions, please feel free to contact Kristin Legg, Chief of Resource Management and Research, at kristin_legg@nps.gov or (435) 772-0208.

Sincerely,



Jock F. Whitworth
Superintendent

cc: Cordell Roy, NPS, Utah State Coordinator